

Town of Hudson

Wisconsin Broadband Expansion Grant Application

Response of Comcast Cable Communications, LLC

March 17, 2022



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Page 1: Cover Sheet

PAGE 1: The first page of the application should be the cover sheet of these application instructions. Fill in the information requested in the blank boxes, sign the attestation, and include as the first page of the grant application. An editable Word version of the page is available on the Commission's website on the Broadband Expansion Grants webpage.

BROADBAND EXPANSION GRANT APPLICATION

For Fiscal Year 2022

Primary Applicant (Name and Address):	<p>Applications MUST be UPLOADED to ERF via the Commission's website, http://psc.wi.gov/apps35/ERF_upload/content/mymenu.aspx. Refer to section 2.3 for detailed instructions.</p> <p>Applications are due and MUST be uploaded to ERF no later than: March 17, 2022 at 4:00pm (16:00) Central Time. Late applications will not be accepted.</p> <p>Contact for further information: PSCStatebroadbandoffice@wisconsin.gov</p> <p>Date: December 1, 2021</p>	
<p>The Public Service Commission of Wisconsin is seeking applications for Broadband Expansion Grants. The Commission may award one or more grants during Fiscal Year 2022 to public and private entities that meet the eligibility requirements set forth in Wis. Stat. § 196.504. This grant round will be funded with bond proceeds authorized by the Wisconsin Building Commission pursuant to Wis. Stat. § 13.48(30). As such, successful applicants are subject to the requirements of Wis. Stat. § 13.48(30). Successful applicants will demonstrate a clear and achievable plan to improve broadband communications services in one or more underserved areas in the State.</p>		
<p>Applicant Certification: In signing this application, the undersigned verifies under penalty of perjury that the Applicant and its employees and agents have not, either directly or indirectly, entered into any agreement or participated in any collusion or otherwise taken any action in restraint of free competition with respect to this application; that no attempt has been made to induce any other person or firm to submit or not to submit an application; that this application has been independently arrived at without collusion with any other proposer, competitor or potential competitor; that this application has not been knowingly disclosed prior to the opening of applications to any other applicant or competitor; that all of the responses and representations of Applicant in this application are true and correct to the best of the undersigned's knowledge, information, and belief; and that Applicant agrees to, accepts, and will comply with all of the terms and conditions respecting this application and any award of a broadband expansion grant as may be established in a grant award Agreement.</p>		
Name of Authorized Representative (Type or Print) Ron Orlando	Title Regional Vice President External Affairs	Phone (215) 823-9463
Signature of Authorized Representative	Date 3/17/2022	

Pages 2 – 3: Summary of Grant Application

PAGE 2-3: The second and third page of the application should be the Summary of Grant Application, included as the second and third page of these application instructions. An editable Word version of the Summary page is also available on the Broadband Expansion Grants webpage.

SUMMARY OF GRANT APPLICATION

Primary Applicant Name Comcast Cable Communications, LLC	Amount of Broadband Grant Request (round to nearest dollar) \$3,061,785
Federal Employer Identification No. 23-2175755	Amount of Matching Funds Pledged (round to nearest dollar) \$7,144,165
Contact Name and Title Karly Baraga-Werner, Sr. Director, Government Affairs Comcast	Total Cost of Proposed Project (round to nearest dollar) \$10,205,950
Telephone Number (651) 900-9953	Project Name Town of Hudson
E-mail Address(es) Karly_Baraga-Werner@cable.comcast.com	Type of Proposed Broadband Service (FTTH, Cable, DSL, etc.) Fiber to the Home
Grant Manager, if different than Primary Applicant	Type of Proposed Project (Last-mile, Middle-Mile, backbone, other) Last Mile
Grant Manager Contact Name	Grant Manager Email Address and Telephone Number
If the application proposes a public-private partnership, list the names, addresses, and FEINs of the partner companies or organization	
Brief Project Description (2 sentences) Comcast proposes to expand its state-of-the-art network from the City of Hudson into the Town of Hudson and bring its full suite of services to approximately 2,406 homes and 286 businesses that do not currently have access to adequate wireline broadband service at competitive speeds and pricing, as demonstrated by the support of the community included in this application. At the conclusion of the fiber-to-the-home project in which Comcast will invest \$7.1M in the Town of Hudson, these currently underserved residents will have the option to purchase many tiers of service, currently up to 1.2 Gbps; access to an affordable, high-speed broadband option; and a network that is scalable to provide gigabit symmetrical speeds.	

Maximum Proposed Download Transmission Speed At least 1 Gbps w/ scalability residential offering 10 Gbps commercial offering (100 Gbps for businesses that meet specific criteria)	Maximum Proposed Upload Transmission Speed At least 1 Gbps w/ scalability residential offering 10 Gbps commercial offering (100 Gbps for businesses that meet specific criteria)
Minimum Proposed Download Speed to Customer Location 50 Mbps (minimum download speed that customer can purchase)	Minimum Proposed Upload Transmission Speed to Customer Location 10 Mbps (minimum upload speed that customer can purchase)
County or Counties served by this project St. Croix County	Community or Communities served by this project Town of Hudson
List of the broadband service providers, if any, currently serving the area the applicant proposes to serve: Baldwin Telecom, Inc. (Cable Modem Service) AT&T Wisconsin (does not meet broadband service speeds) T-Mobile (does not meet broadband service definition)	
Does proposed project serve an <u>unserved</u> area of the State, as defined in Section 1.4 of the application instruction? (yes/no) No	Is the Applicant certified as a Broadband Forward! Community or Telecommuter Forward! Community, or does the grant project propose to serve a Broadband Forward! Community or Telecommuter Forward! Community? (yes/no) No
For last mile projects or component the expected number of Business Locations that will have access to the improved broadband service (i.e., total business locations passed or with new service access). 286	For last mile projects or components the expected number of Residential Locations that will have access to the improved broadband service (i.e., total residential locations passed or with new service access). 2,406
Of the improved business locations, how many locations are <i>unserved</i> ? None	Of the improved residential locations, how many are <i>unserved</i> ? None
For providers that are eligible telecommunications carriers will the proposed broadband service be available to Lifeline customers? (yes/no) No	Are there any programs available for low-income households to access low-cost service or discounts? (yes/no) Yes
Is the internet service provider currently participating in the Emergency Broadband Benefit Program? (yes/no) Yes	Is the internet service provider currently participating in the Department of Public Instruction and CESA purchasing's Digital Learning Bridge? (yes/no) Yes
Did the internet service provider participate in the Public Service Commission's voluntary Broadband Coverage Data Collection in 2021? (yes/no) Yes	

Page 4: Summary of Project Budget and Funding Statement

Comcast seeks \$3,061,785 to complete the proposed project that consists of approximately 109 miles of fiber. Comcast upon award of the grant will be responsible for any matching funds and will provide the labor and materials to complete the provision of services to the area delineated in the attached map. The total value of the labor and materials provided by Comcast is \$7,144,165. Wisconsin Broadband Expansion Grant Program requested funding is \$3,061,785 would represent approximately 30% of the total project cost.

FY22 Broadband Expansion Grant Application Budget & Income Summary



Please complete this form using Microsoft Excel. A PDF copy must be attached to your application as page four. In addition, this form must also be uploaded to ERF in Excel format.

Grant Summary

Grant Applicant:	Project:
Comcast	Hudson WI

Budget

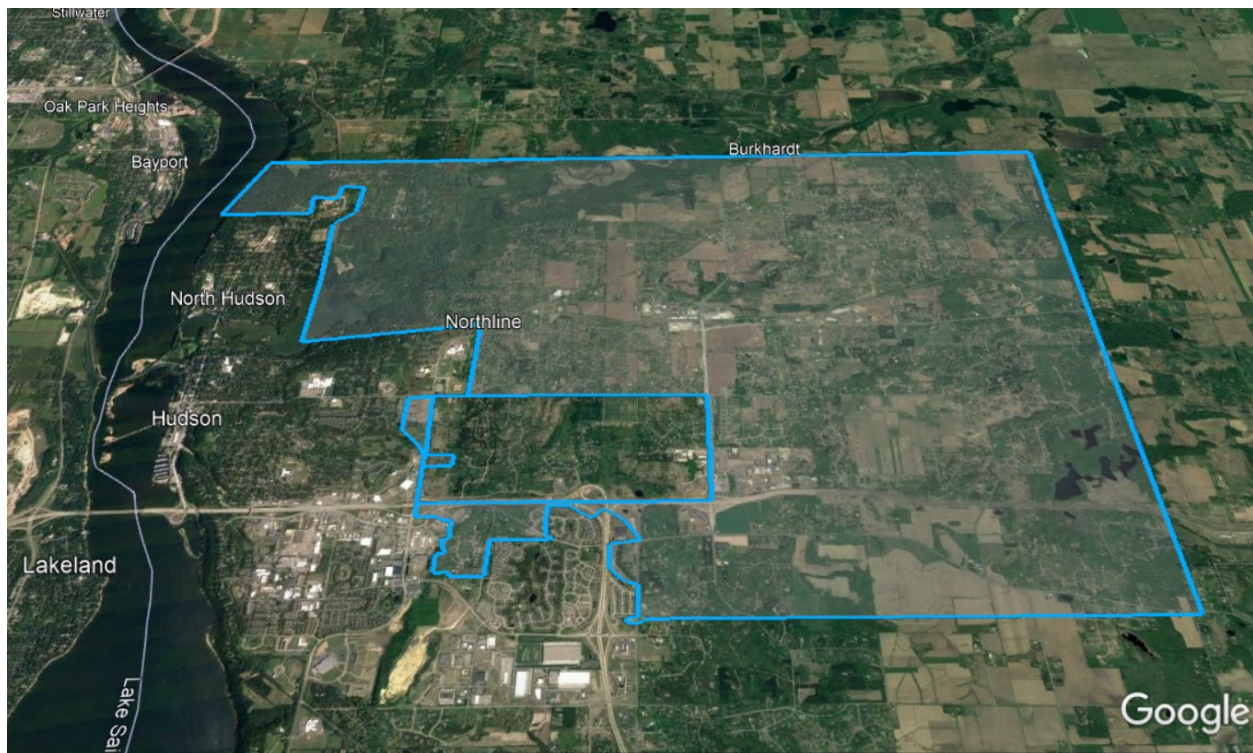
Line:	Description / Category:	Grant Funds:	Match:	Total:
1	Contractual, Consultant Fees	\$ 1,902,594.02	\$ 4,439,386.05	\$ 6,341,980.07
2	Equipment	\$ 64,459.20	\$ 150,404.80	\$ 214,864.00
3	Supplies	\$ 701,511.99	\$ 1,636,861.32	\$ 2,338,373.31
4	Labor (Salary, Fringe)	\$ 148,883.30	\$ 347,394.36	\$ 496,277.66
5	Permitting, Licensing Fees	\$ 244,336.36	\$ 570,118.16	\$ 814,454.52
6	Travel			\$ -
7	Other			\$ -
Total:		\$ 3,061,784.87	\$ 7,144,164.69	\$ 10,205,949.56
		70.0% match requested		

Pledged Contributions

#:	Entity:	Entity Type:	Pledge Type:	Pledge:
1	Comcast	Applicant	Cash	\$ 7,144,164.69
2				
Total:				\$ 7,144,164.69

As the budget summary chart demonstrates, the requested Wisconsin Broadband Expansion Grant will not subsidize the expenses of Comcast or the monthly bills of telecommunications customers, and the grant funds requested will be used for the sole purpose of constructing broadband infrastructure in the Town of Hudson. The facilities would be owned by Comcast.

Page 5: Map(s)



The proposed project area outlined in blue and shaded includes the entire Town of Hudson that is listed on the State of Wisconsin Broadband Map as served by only one (1) Broadband Service provider as that term is defined for this program, Baldwin Telecom.

The map also contains a rectangular section highlighted in blue and not shaded that contains approximately 165 homes. The State of Wisconsin Broadband Map shows this area of the Town of Hudson as served by both Baldwin Telecom and Nexterra Fixed Wireless. This rectangular area, therefore, is not “underserved” and likewise not included in the proposed project area. Comcast will, however, also extend its network into this area of Town of Hudson if it is awarded its proposed grant for the areas of Town of Hudson that are currently underserved. To be clear, the cost of this build is not included in the budget summary chart for the proposed project, but would be considered a separate project funded entirely by Comcast.

This project is shovel ready. The project will commence upon completion of a grant agreement, and we anticipate completing the project no later than 24 months from the start date of construction. Assuming that we can complete a Grant Agreement in May 2022, we will immediately order materials, with the goal to complete the project prior to November 2023. Key risks include any make-ready work needed by the pole owner and delays in the permitting process. These risks will be mitigated by working in partnership with the pole owners to quickly address make-ready concerns and the right-of-way authorities to secure permits in a timely manner. Additionally, a significant portion of this build of 109 miles of fiber requires underground construction and placement, which is dependent on favorable weather during construction season and available business partner resources.

Comcast will comply with all environmental and historic preservation requirements. The project outlined in this application involves a combination of underground and aerial construction. To date, no environmental issues or historic preservation requirements have been identified.

If the grant application for the project is approved by May 2022, Comcast has a tentative build schedule listed below.

Time Frame	Project Action
May- June 2022	Permit designed routes and allocate materials. Begin locates.
July- November 2022	Underground and aerial placement, mainline splicing, and install drops.
November 2022- March 2023	Continue aerial placement/mainline splicing through winter.
April 2023-November 2023	Complete remaining underground/aerial routes, splicing, and drop activations.
November 2023	Request final payment of Grant Funds

Pages 6 – 30: Narrative
A. Matching funds

Comcast, upon award of the grant, will be responsible for any matching funds and will provide the labor and materials to complete the provision of services to the area delineated in the attached map. The total value of the labor and materials provided by Comcast is \$7,144,165. Wisconsin Broadband Grant Expansion Program requested funding of \$3,061,785 would represent approximately 30% of the total project cost. A breakdown of costs is attached below.

Budget				
Line:	Description / Category:	Grant Funds:	Match:	Total:
1	Contractual, Consultant Fees	\$ 1,902,594.02	\$ 4,439,386.05	\$ 6,341,980.07
2	Equipment	\$ 64,459.20	\$ 150,404.80	\$ 214,864.00
3	Supplies	\$ 701,511.99	\$ 1,636,861.32	\$ 2,338,373.31
4	Labor (Salary, Fringe)	\$ 148,883.30	\$ 347,394.36	\$ 496,277.66
5	Permitting, Licensing Fees	\$ 244,336.36	\$ 570,118.16	\$ 814,454.52
6	Travel			\$ -
7	Other			\$ -
Total:		\$ 3,061,784.87	\$ 7,144,164.69	\$ 10,205,949.56
70.0% match requested				

Equipment costs are based on national rates from national manufacturers.

B. Public-private partnerships.

The Town of Hudson has demonstrated its support for Comcast's proposed project and its commitment to work with Comcast if the grant is awarded. See attached letter from the Town of Hudson.

C. Existing broadband service.

The Wisconsin State Broadband map shows the proposed project area to be served by only one (1) other Broadband Service provider as that term is defined for this program:¹

¹ See Broadband Grant Application for Fiscal Year 2022, page 2, "Broadband service means a communications service designed to provide end users with a reliable two-way data transmission, with a minimum speed of at least 25 mbps for download transmission and 3 mbps for upload transmission, but does not include a commercial mobile radio service or a broadband service in which a stand-alone satellite provider connects directly to the end user with a satellite connection."

- Baldwin Telecom, Inc., Cable Modem Service – DOCSIS 3.0 at 75 Mbps download and 75 Mbps upload.

As demonstrated in Section D of this Application, the network that Comcast proposes to build throughout the Town of Hudson is significantly different than Baldwin Telecom’s network. Comcast proposes to build a fiber to the home, last-mile network that will provide broadband speeds of up to 1.2 Gbps download and 35 Mbps upload, with scalability to download and upload speeds of up to 1 Gbps. Comcast’s project, therefore, proposes to make a critical investment into the Town of Hudson to bring a new, high-capacity network that can serve the Town’s current and future broadband needs.

The Wisconsin State Broadband Map shows the proposed project area to be served by one (1) DSL Provider:

- AT&T Wisconsin, Asymmetrical DSL, at 6 Mbps download and 1 Mbps upload.

The Wisconsin State Broadband Map shows the proposed project areas to be served by two (2) CMRS and three (3) Satellite providers that do not provide qualify Broadband Service:

- AT&T Wisconsin, Terrestrial Fixed Wireless
- T-Mobile, Terrestrial Fixed Wireless²
- HughesNet
- Viasat, Inc.
- VSAT Systems, LLC

We could not locate targeted subscribership data in the proposed project area but based on the St. Croix County Broadband Report, county-wide results show that approximately 8% of the survey respondents reported subscribing to AT&T, 3% of the survey respondents reported subscribing to T-Mobile, and 18% subscribed to Baldwin Telecom.³

D. Project impact.

This grant will enable Comcast to extend broadband service at customer speed tier offerings ranging from 50 Mbps to 1.2 Gbps download speeds to 2,406 underserved homes and 286 businesses in the proposed service area by November 2023. The proposed project area will have access to some of the fastest and most reliable broadband speeds available nationwide, and a scalable network that can grow with customer demand.

² The Wisconsin State Broadband Map was updated in February 2022 and the proposed service area of the Town of Hudson was changed from “underserved” to “served” due only to T-Mobile’s reported service. CMRS is not a Broadband Service under the definition cited in the Grant Application in footnote 1 above, so the proposed service area remains “underserved.”

³ See **St. Croix County Broadband Development Options**, page 66, published by Design Nine in 2021, found at [St. Croix County Broadband Study.pdf \(sccwi.gov\)](https://www.sccwi.gov/St_Croix_County_Broadband_Study.pdf).

The network will be served by Comcast’s state-of-the art headend facility already providing service in Western Wisconsin, which will enable Comcast to provide a variety of products and services and a seamless experience for Town of Hudson residents, including the Comcast X1 video platform and Xfinity Mobile. The facility already has in place critical operational advantages in reliability and efficiency including backup power and a 24X7 monitoring of all the facets of the delivery system.

Comcast Residential Tiers

As detailed in the table below, which provides our current broadband offerings, Comcast will offer customers multiple choices of residential and commercial broadband services, depending on the customers’ specific needs:

Residential Internet Tier	Speed (down/up)	EDP (Everyday Pricing)
Connect	50 Mbps / 10 Mbps	\$60.00
Connect More	100 Mbps / 10 Mbps	\$70.00
Fast	300 Mbps / 10 Mbps	\$80.00
Superfast	600 Mbps / 20 Mbps	\$90.00
Ultrafast	900 Mbps / 20 Mbps	\$100.00
Gigabit	1.2 Gbps / 35 Mbps	\$110.00

Note: Prices above do not include equipment or applicable taxes, fees, and surcharges. Rates stated are the monthly rates for standalone Internet service as of the date of this submission. Pricing is subject to change. Discounted pricing may be available to customers who accept promotional offers or term agreements for Internet service or buy one or more additional services.

This investment by Comcast will have an immediate and significant impact on the residents of the Town of Hudson that currently appear to have only one tier of broadband service offering available – a 75 Mbps download/upload tier of service for \$94.95/mo.⁴

As discussed in more detail below, our network services today include broadband offered on a wired and Wi-Fi basis in homes, businesses, and public locations. Comcast’s broadband service capabilities include current offerings of up to 10 Gigabit symmetrical services to businesses (and as high as 100symmetrical Gigabits for businesses that meet specific criteria), and our residential broadband speeds in Wisconsin range from 50 Mbps up to 1.2 Gbps.

⁴ The State of Wisconsin Broadband Map shows the Town of Hudson served by Baldwin Telecom providing a Cable Modem Service at 75 Mbps based on data submitted on June 30, 2021. The County of St. Croix Broadband Development Options Report that was published in Fall 2021 shows that Baldwin Telecom’s least expensive stand-alone Cable Modem tier is \$94.95. See **St. Croix County Broadband Development Options**, page 36, published by Design Nine in 2021, found at [StCroix County Broadband Study.pdf \(sccwi.gov\)](https://www.sccwi.gov/StCroix_County_Broadband_Study.pdf). Baldwin Telecom advertises a 300 Mbps offering on its website for \$114.95/mo. for Town of Baldwin and Town of Troy, but this is not consistent with the data reported to the State of Wisconsin as reflected on its maps. See <https://www.baldwinlightstream.com/54016-Town-of-Hudson-Troy>.

Comcast proposes to construct the project using all fiber-optic technology capable of providing **multigigabit symmetrical speeds**. Fiber-optic cables emanating from Comcast's network hub will be constructed to terminals directly connected to subscribers' homes, businesses, and/or community anchor institutions in the Town of Hudson. This all-fiber network will be future-proof and highly scalable, permitting bandwidth potential well beyond foreseeable needs, fast symmetrical speeds, and low latency. Over time, the network will be readily scalable to meet consumer demands for even higher speeds and more bandwidth simply by upgrading modulating electronics within the already-deployed network. There is no end-of-life expected for this network.

The proposed project will be capable of delivering multigigabit symmetrical speeds and service offerings. Specific product offerings will be based on then-current consumer demand and market conditions.

Comcast Business Tiers

Comcast Business Services offers a variety of products and services to businesses. High-speed Internet services provide downstream speeds that range up to 1Gbps and fiber-based speeds that range up to 100 Gbps. Our service offerings for small business locations primarily include high-speed Internet services, as well as voice and video services, that are similar to those provided to residential customers, cloud-based cybersecurity services, wireless backup connectivity, advanced Wi-Fi solutions, video monitoring services and cloud-based services that provide file sharing, online backup and web conferencing, among other features. Comcast also offers Ethernet network services that connect multiple locations and provide higher downstream and upstream speed options to medium-sized customers and larger enterprises, as well as advanced voice services, along with video solutions that serve hotels and other large venues.

Tier	Speeds Up To	Standalone Pricing
Starter	35Mbps / 5 Mbps	\$ 71.95
BI100	100 Mbps / 15 Mbps	\$159.95
BI200	200 Mbps / 20 Mbps	\$259.95
BI300	300 Mbps / 30 Mbps	\$309.95
BI600	600 Mbps / 35 Mbps	\$359.95
BI 1G	1.0 Gbps/ 35Mbps	\$499.95

Note: Prices above do not include equipment or applicable taxes, fees, and surcharges. Rates stated are the monthly rates for standalone Internet service as of the date of this submission. Discounted pricing may be available to customers who accept promotional offers or term agreements for Internet service or buy one or more additional services.

In addition to having improved access to broadband services upon completion of this project, customers in the Town of Hudson will also be offered Comcast's full suite of products and services, including voice, video, and home security services. As detailed above, residential Xfinity Internet and Video customers will have access to Xfinity X1, Comcast's video platform that delivers the simplest, fastest, and most complete way for customers to access all their entertainment on all their screens.

In addition, Comcast customers who subscribe to an Xfinity Internet package will have access to Xfinity WiFi hotspots, including those that would be newly added to the Town of Hudson for no additional cost. Moreover, these customers would be able to access any of Comcast's hotspots throughout Wisconsin and across the country. Comcast has the country's largest WiFi network, including more than 22.5 million hotspots nationwide. Combined with the company's recently launched Xfinity xFi platform, a new and personalized home WiFi experience, Comcast will provide its customers in the Town of Hudson with the fastest speeds, the best WiFi coverage, and ultimate WiFi control in their homes. Xfinity Internet customers may also have the option to sign up for Xfinity Mobile service, which includes up to five lines with unlimited talk and text.

As is Comcast's usual practice through its footprint, Comcast will support all customers in the Town of Hudson with call centers as well as self-service options such as digital and chat. Many customers take advantage of Comcast's different tools, including the MyAccount feature within the Xfinity app, which is available on the web and mobile devices. Customers can manage their service in many ways through the app, such as by troubleshooting a device in the home, managing programming options, and receiving important notifications.

Low-Income Access Program – Internet Essentials

As that world becomes more digital, it's our responsibility to use media and technology to ensure that everyone has the resources and opportunities they need to participate and excel in today's society. Under Comcast's Internet Essentials offering – the most comprehensive and successful low-income broadband adoption program in the nation – qualifying residential customers can obtain broadband service at speeds of up to 50 Mbps/10 Mbps for \$9.95/month, or speeds of up to 100 Mbps/10 Mbps for \$29.95/month with Internet Essentials Plus, plus applicable taxes, fees and surcharges, as well as free digital skills training in person and online. Customers also have the option to purchase a low-cost Internet-ready computer. Internet Essentials is open to *all* low-income households within Comcast's footprint, including families that qualify for federal assistance (e.g., National School Lunch Program, Medicaid, housing assistance) and low-income veterans, senior citizens, and persons with disabilities.

We have worked closely with our partners to refine the Internet Essentials program in meaningful ways and expanded the eligible population numerous times. Together, we are committed to creating and supporting digital equity within the communities we serve. In 10 years we have expanded eligibility 12 times—bringing Internet Essentials to new audiences such as public housing residents, low-income veterans, seniors, community college students, and most recently, to all qualified low-income households living in Comcast's service area. Comcast has also

increased the speeds for Internet Essentials, with the most recent speed increase to 50 Mbps/10Mbps occurring earlier this year. Since 2011, Internet Essentials has connected a cumulative total of more than ten million Americans to the Internet.

Internet Essentials is about far more than bringing high-speed Internet into a home. From the beginning, we have designed our program based on comprehensive and consistent research which tells us there are three main barriers to broadband adoption: 1) a lack of perceived need for or interest in (and even fear of) the Internet, mostly stemming from limited digital skills, 2) not having functioning equipment, and 3) the cost of a monthly service subscription. Internet Essentials has been designed to address all of these barriers head-on. We continue to rely on external research, as well as sponsoring and conducting our own, to expand our understanding of these complex and evolving issues.

Comcast is proud to be an approved provider supporting the federal government's Affordable Connectivity Program (ACP) program. Under the ACP program, qualifying customers may apply a credit of up to \$30 per month (\$75 per month in Tribal lands) to any Xfinity Internet service tier, including Internet Essentials and one line of Unlimited on Xfinity Mobile.

Internet Essentials Plus is a new tier of service for Comcast's hallmark digital equity program that is available in all Comcast service areas to any customer who qualifies. It offers twice the download speed – up to 100 Mbps – of the traditional Internet Essentials service, which has a 50 Mbps download speed. Internet Essentials Plus is available for \$29.95/month to new customers who qualify. Existing Internet Essentials customers can upgrade to this new, faster tier at any time. Customers who subscribe to Internet Essentials Plus and enroll in ACP will effectively get broadband for free after the \$30/month government discount is applied.

Comcast's top-rated Xfinity Mobile service, which includes 5G, is now available to customers enrolled in ACP, giving them the ability to save money on their connectivity needs inside and out of the home. Internet Essentials customers can use their \$30/month ACP discount to pay for both Xfinity Internet and Xfinity Mobile service.

Customers can also call to speak to a dedicated ACP Enrollment and Support Center that is available from 8AM to 12AM daily, with multi-lingual capabilities to assist anyone interested in the program.

For more information, please see attached press release.

Connecting more people to the Internet and the technology they need to participate and excel in an increasingly digital world has been a core focus for Comcast. We have been very active in getting ACP information disseminated throughout our footprint. Our outreach includes school districts, community partners, libraries, and government officials to help ensure all eligible residents are aware of the ACP program and how it can help their household. Along with these communications, we have shared social media posts and advertisements in many local publications, including those that represent the multicultural community. Our materials are available to all our partners free of

charge in 35 different languages. Our online application can also be translated into seven different languages to help households connect to the internet.

These Internet Essentials offerings, coupled with the ACP program, will have a significant beneficial impact on the qualifying families in the Town of Hudson. The St. Croix County Broadband Report shows that there are census blocks within the Town of Hudson in which 22.7% and 17.83% of residents are low-income.⁵

Further Information on Products and Services to be Made Available by the Proposed Project:

High-Speed Internet Services. For years, we've made strategic investments in building capacity not just to meet our customers' current needs, but to stay well ahead of future demand. Connectivity is the center of our customers' lives, so we've built a network that combines gig speeds with wall-to-wall WiFi, and millions of hotspots to provide the speed, coverage and control our customer's need. Comcast's high-speed Internet services include access to an online portal and mobile apps, which provide users with the ability to manage their home Wi-Fi network, access to advanced security technology and other features including email, an address book and calendar. For high-speed Internet customers that prefer streaming content over the Internet rather than linear cable television, Comcast offers Flex, a streaming device that provides access to certain online programming on their television with integrated search functionality, including the use of a voice-activated remote control and personalized recommendations. Flex programming includes Comcast's Peacock service and certain other Internet-based apps at no additional charge, access to pay-per-view and video on demand content, and access to and the integration of certain third-party direct-to-consumer streaming services such as Amazon Prime Video, Apple TV, HBO Max, Hulu, Netflix, YouTube, and Disney+. Additionally, a variety of music apps such as Pandora are offered through Flex.

Video Services. Comcast also offers a broad variety of video services, primarily through our X1 platform, an IP and cloud-enabled video platform that delivers the simplest, fastest, and most complete way for customers to access all their entertainment on all their screens. Video customers have access to hundreds of channels depending on the level of service, which typically range from limited basic service with access to between 20 and 60 channels to full service with access to more than 300 channels. Video services generally include programming provided by national broadcast networks, local broadcast stations, and national and regional cable networks, as well as government and public access programming. Our video services also include access to video on

⁵ See **St. Croix County Broadband Development Options**, page 5, published by Design Nine in 2021, found at [StCroix_County_Broadband_Study.pdf \(sccwi.gov\)](https://www.sccwi.gov/StCroix_County_Broadband_Study.pdf)

demand services and an interactive, on-screen program guide. Through the X1 platform, customers have integrated search functionality, including the use of the X1 Voice Remote, a voice-activated remote control that customers can use to change channels, search for shows, get recommendations, and more; and access to and the integration of Peacock, which X1 customers receive for no additional charge, certain third-party direct-to-consumer streaming services such as Amazon Prime Video, HBO Max, Hulu, Netflix, YouTube, and Disney+, and a variety of other Internet-based apps providing content and music. Customers have access to their video services through the Stream mobile app and an online portal that allow them to view certain live programming and OnDemand content and to browse program listings.

Home Security. Xfinity Home, named CNET's best professionally installed home security product, provides next-generation home security and control. In addition to a 24/7 professionally monitored, full-service home security system, Xfinity Home also offers Self Protection, powered by xFi and Xfinity Home cameras, is designed for consumers who want to keep an eye on the things that are important to them without a whole-home security solution. Xfinity Home, powered by Xfinity Internet, is one of the fastest growing home security providers in America. Not only does it offer peace of mind with 24/7 professional monitoring with battery and cellular backup, but it also includes smarter home security features like video monitoring and the ability to manage and control an increasing number of third-party smart home devices from a phone, tablet, the Xfinity Home touchscreen, or via the X1 Voice Remote.

VoIP Services. In addition, Comcast offers voice services using interconnected Voice over Internet Protocol technology. Service options provided include either unlimited or usage-based local and domestic long-distance calling, as well as options for international calling plans, voicemail, readable voicemail, nuisance call blocking tools and various call features such as caller ID and call waiting. Voice services also include the ability to access and manage voicemail and other account features through an online portal or mobile app.

Xfinity Mobile. Furthermore, Comcast offers wireless services for handsets, tablets and smart watches using mobile virtual network operator rights to provide the services over Verizon's wireless network and our existing network of in-home and outdoor Wi-Fi hotspots. We currently only offer these services as part of our bundled service offerings to residential customers that subscribe to high-speed Internet service within our cable distribution footprint and to a limited group of small business high-speed Internet customers on similar terms. Customers may choose to pay for services on an unlimited data plan, shared data plans, or per gigabyte of data used. Customers have the ability to bring their own device or purchase them from us with the option to pay upfront or finance the purchase interest-free over 24 months.

Comcast Business Services. Comcast Business Services offers a variety of products and services to businesses. High-speed Internet services provide downstream speeds that range up to 1Gbps and fiber-based speeds that range up to 100 Gbps. Our service offerings for small business locations primarily include high-speed Internet services, as well as voice and video services, that are similar to those provided to residential customers, cloud-based cybersecurity services, wireless backup connectivity, advanced Wi-Fi solutions, video monitoring services and cloud-based services that provide file sharing, online backup and web conferencing, among other features. Comcast also offers Ethernet network services that connect multiple locations and provide higher downstream and upstream speed options to medium-sized customers and larger enterprises, as well as advanced voice services, along with video solutions that serve hotels and other large venues. In addition, Comcast provides cellular backhaul services to mobile network operators to help them manage their network bandwidth. Comcast has expanded its service offerings to include a software-defined networking product for medium-sized and enterprise customers. Larger enterprises may also receive support services related to Wi-Fi networks, router management, network security, business continuity risks and other services. These service offerings are primarily provided to Fortune 1000 companies and other large enterprises with multiple locations both within and outside of Comcast's cable distribution footprint, where we have agreements with other companies to use their networks to provide coverage outside of our service areas.

Customer Service. We take pride in our products. We deliver on terms, including 24/7 support, easy self-service tools on any device and two-hour appointment windows. In addition to Comcast's deep experience as a communications service provider and variety of service offerings, Comcast also has the appropriate number of technicians, call center agents and backend support employees to care for additional customers. Comcast also maintains large, locally based engineering and technical operations teams that work around the clock to maintain service reliability and provide direct support to the company's business and residential customers. Moreover, Comcast's network is proactively monitored and maintained 24/7 by dedicated local and national teams. This approach helps Comcast detect and resolve potential signal problems before they impact customer services. From our products to our people, we're committed to delivering the best experience possible.

E. Scalability.

Comcast has built a fiber backbone at the core of its network that stretches across the country with more than 191,000 route miles of fiber— using the industry's advanced optics/lasers and IP routing technologies. Dozens of converged regional area networks interconnect to create this fiber backbone that delivers video, voice, and high-speed Internet services to tens of millions of customers throughout the country. IP technology ties all of this together, creating a highly scalable

connectivity platform or “IP core.” Comcast has been building fiber into its network incrementally over the past decade. In 2015, Comcast introduced Gigabit Pro, the industry’s first residential fiber-to-the-home 3 Gbps service ever offered by an Internet service provider in the United States.

Comcast proposes to construct the project using all fiber-optic technology. The fiber plant will be capable of multigigabit symmetrical service. This all-fiber network will be highly scalable, permitting bandwidth potential well beyond foreseeable needs, fast symmetrical speeds, and low latency. Over time, the network will be readily scalable to meet consumer demands for even higher speeds and more bandwidth simply by upgrading modulating electronics within the already-deployed network. Specific product offerings will be based on then-current consumer demand and market conditions.

Over the last several years, Comcast has made extensive, multi-million-dollar investments in new coaxial and fiber network throughout the nation, ensuring that Comcast’s services to both business and residential customers are scalable and capable of expanding to meet evolving community needs. We have extended our infrastructure to more and more businesses since launching our commercial service less than 15 years ago, bringing competition and lower prices to the small, medium, and large business sector market. And we continue an aggressive and proactive multi-million-dollar construction investment effort to extend our network even further throughout the communities we serve. We have also been on a pace of doubling network capacity every 2 ½ years, which ensures that we stay well ahead of consumer demand.

As discussed in more detail above, our network services today include broadband offered on a wired and Wi-Fi basis in homes, businesses, and public locations. Comcast’s broadband service capabilities include up to 10 Gigabit symmetrical services to businesses (and as high as 100 symmetrical Gigabits for businesses that meet specific criteria), and our residential broadband speeds currently offered in Wisconsin range from 50 Mbps to 1.2 Gbps.

Comcast is also one of the first U.S. Internet Service Providers to offer a Wi-Fi 6 Certified gateway with the latest version of its xFi Advanced Gateway, which is capable of delivering multi-Gigabit speeds via ethernet that has laid the groundwork for Gigabit speeds over WiFi. Customers on the new upgraded Xfinity Gigabit tier will require an xFi Advanced Gateway, or one of the WiFi 6 capable devices approved to work with the Xfinity network to receive the faster speeds.

F. Economic development.

The Wisconsin Department of Administration’s population projection report found that St. Croix County is projected to be the fastest-growing county in the State, in terms of percentage change, through 2040, increasing by 41% (from census data in 2010). As a component county of the Minneapolis-Saint Paul metropolitan area, it also ranked as Wisconsin’s top-growing county from 1980 to 2010.⁶ Abundant and affordable broadband is critical to ensure that the Town of Hudson

⁶ [FAQs • St. Croix County, WI • CivicEngage \(sccwi.gov\).](#)

is able to benefit from this growth and crucial to ensuring that the Town of Hudson is an attractive place to live and start a business, particularly in today's world of working at home and starting home-based businesses. This growth is recognized by local officials such as State Representative Zimmerman who states in the letter attached, "The Town of Hudson is located in a rapidly expanding and dynamic area. To take advantage of that growth, it would be strategically smart for the state to ensure that residents in the Town of Hudson have broadband access."

St. Croix County's 2021 broadband report, "St. Croix County Development Broadband Options" ("St. Croix County Broadband Report"), describes the crucial economic impact of future-looking broadband network investment:

There are many areas and communities in St. Croix County that can be attractive to an emerging new group of businesspeople and entrepreneurs that typically are well-educated, own their own businesses or work for large global corporations, and are making choices on where they live based on family needs and interests rather than business interests....These businesspeople and their families make relocation decisions based on quality of life only where there is abundant and affordable broadband, because broadband enables this new approach to personal and work life....In short, St. Croix County has many areas hampered by low-end broadband in the form of DSL, very limited wireless, expensive satellite internet, and very limited cable modem service. They also have very limited high-end broadband in the form of fiber to a few businesses and institutions.

The St. Croix County Broadband Report goes on to recommend:

If the County is to make investments in broadband and telecommunications infrastructure, it is absolutely critical that those investments are able to scale gracefully to meet business and economic development needs for decades.⁷

The Town of Hudson does not currently have the broadband infrastructure in place to attract to these businesspeople and telecommuters that are vital to building a strong town into the future. The State of Wisconsin's broadband map lists Baldwin Telecom at cable modem speeds of 75 Mbps, and the St. Croix County Broadband Report lists Baldwin Telecom's least expensive tier of broadband service at \$94.95.⁸ It appears then, that the only choice the Town of Baldwin residents have for broadband is a 75 Mbps tier of service for \$94.95.

The St. Croix County Broadband Report reflects that the customers of Baldwin Telecom are not satisfied with the limited broadband choices and pricing that are available to them. In the Summer of 2021, a broadband survey was conducted in St. Croix County with a successful response rate of

⁷ **St. Croix County Broadband Development Options**, pages 29-30, published by Design Nine in 2021, found at [StCroix_County_Broadband_Study.pdf \(sccwi.gov\)](https://www.sccwi.gov/StCroix_County_Broadband_Study.pdf).

⁸ **St. Croix County Broadband Development Options**, page 36, published by Design Nine in 2021, found at [StCroix_County_Broadband_Study.pdf \(sccwi.gov\)](https://www.sccwi.gov/StCroix_County_Broadband_Study.pdf).

16%.⁹ A common theme in the comments that residents eagerly submitted was dissatisfaction with Baldwin Telecom's lack of speed-tier options and pricing options. The full report can be found on the St. Croix County website¹⁰, and applicable excerpts of the comments have been attached to this Application.

Furthermore, the Town of Hudson's proximity to the Twin Cities Metro, as well as to the City of Hudson, requires that faster, more tailored business-class internet services be offered at competitive prices, or the Town risks losing businesses to a neighboring city and metro region with much more attractive offerings. This risk is also recognized by the Hudson Chamber of Commerce, which acknowledges that affordable broadband is critical to business attraction and business growth, that Comcast has a proven track record of innovation and investment in the area, and that a strong business community in the Town of Hudson benefits the entire region-wide business community. The Hudson Chamber of Commerce, therefore, has provided its support for this proposed project via a formal letter attached to this Application.

Businesses in the Town of Hudson have also offered their support for the proposed project. As the attached letter of support illustrates, businesses are dissatisfied by the service and pricing currently offered in the Town of Hudson. Business-owners in the Town of Hudson recognize that business health and growth are greatly impacted by lack of abundant, affordable broadband. If the proposed project is awarded, all 286 business in the town of Hudson will be immediately impacted by the improved broadband speeds and choices that Comcast will offer. Providing gigabit broadband service to this underserved area will also enable teleworkers and entrepreneurs to engage in increased digital commerce such as on-line sales and marketing and increase the area's attractiveness for new entrepreneurs and start-up entities, create economic development opportunities and help in the creation and retention of jobs. Providing improved broadband service to this underserved area will greatly improve the community's quality of life by enabling residents to bridge the local skills gap, expand their career pathways, access, and engage in telehealth opportunities, pursue education, and more. These opportunities are limited with the extremely limited speed tiers and pricing offered by Baldwin Telecom.

Today, the majority of employment opportunities are disseminated via online sources. Access to improved broadband speeds and pricing will enable residents of the Town of Hudson to easily search for and apply to open job listings and communicate with potential employers. St. Croix County's Broadband Report found that 63% of survey respondents work from home either full-time or part-time.¹¹ Access to speed-tiers and pricing that fit each worker's actual needs, therefore, will support this trend that only looks to increase in the future.

Improved access to broadband speeds and pricing will also enable the Town of Hudson residents to take greater control over their health care. Residents will be able to remotely access important

⁹ A complete report of the St. Croix County Residential Survey Results can be found at [St.Croix County Survey Report v02 \(sccwi.gov\)](https://www.sccwi.gov/StCroixCountySurveyReportv02).

¹⁰ [St. Croix County Survey Report v02 \(sccwi.gov\)](https://www.sccwi.gov/StCroixCountySurveyReportv02)

¹¹ **St. Croix County Broadband Development Options**, published by Design Nine in 2021, found at [StCroix County Broadband Study.pdf \(sccwi.gov\)](https://www.sccwi.gov/StCroixCountyBroadbandStudy.pdf).

health-related resources and technology, as well as communicate directly with health care providers.

Furthermore, with access to more abundant and affordable broadband, 2,406 community residents will be able to pursue education from their own homes and on their own time, which could provide significant savings compared to an on-campus traditional education experience. Online courses can be taken by anyone: homeschooled children, college students, entrepreneurs, freelancers, officegoers, and retirees. Education resources such as those offered by universities allows students to obtain a degree at their own pace and schedule without the added costs of on-campus life. Without affordable Internet and increased broadband capacity, residents lack the opportunity they need to pursue a modern education and compete in today's world.

Illustrating this impact, in a recent Comcast survey, 76% of participants in Comcast's Internet Essentials broadband adoption program said their service has helped someone in their household find a job, and 78% of households with lost wages due to COVID-19 believe Internet Essentials has helped reduce that loss. 79% said the service has helped them find health and/or medical information. Significantly, 90% reported a positive impact on their child's grades.

Comcast will drive broadband adoption through a variety of means including mailing information to residents, local media and outreach to the community. Interested residents will be able to sign up for service by calling Comcast's toll-free telephone number, using our website or in person at the nearest Xfinity store. Comcast employs a sales and marketing team of professionals to support these efforts and call center team members are skilled in addressing questions regarding Comcast's products and services. If conditions allow, a public meeting or event can be held in conjunction with the Town of Hudson and St. Croix County in or near the proposed project area to inform the residents about the upcoming work and answer questions.

Through innovation and investment, Comcast is proud to drive economic growth and opportunity. In Wisconsin specifically, Comcast serves over 25,000 customers in our service area covering Hudson, River Falls, Prescott and Manitowoc. Comcast's operations in the Wisconsin area, known as the Twin Cities Region (TCR), is led by Kalyn Hove, and is headquartered in Saint Paul, Minnesota. The company has 1,600 employees in the TCR market, including western Wisconsin. Comcast's investments start with its workforce through competitive pay, benefits, training, and flexible working arrangements. Next comes our network. Over the past three (3) years, Comcast has invested billions in infrastructure throughout our service footprint in the Region and throughout Wisconsin, which consists of 4,303 fiber distribution miles. Specifically, in our Wisconsin service area of Hudson, River Falls, Prescott and Manitowoc, the company has invested over \$12 million in infrastructure upgrades since 2018.

Comcast Wisconsin Operations Snapshot

Regional Headquarters	\$49.3 million	\$19.1 million
St. Paul, Minnesota	Comcast invested in Wisconsin, including capital expenditures, employee wages & benefits, taxes & fees, & charitable giving in the last 3 years	Invested in payroll, benefits, and training for our Wisconsin workforce in the last 3 years
\$17.4 million	\$12.7 million	\$1.3 billion
Taxes, fees, and permits paid to & collected for Wisconsin state and local governments in the last 3 years.	Technology & infrastructure investments in the last 3 years, including upgrades to our broadband network.	Total cash & in-kind charitable contributions invested in Wisconsin & nationwide to nonprofits in the last 3 years.
\$47 million	4,800 IE Connects	41,800
Value of charitable COVID-10 relief efforts (2020)	Cumulative low-income Wisconsin residents connected to the Internet through Internet Essentials since 2011.	Wisconsin homes & businesses have access to Xfinity & Comcast Business products & services.

G. Effect upon broadband service to adjacent areas.

There is no characteristic of the proposed project that should impair the ability of a broadband service provider to extend broadband service to areas adjacent to the proposed project area.

Other Information Supporting the Filing

- a. A description of applicant's history or experience constructing broadband communications facilities in the State and elsewhere.

Comcast is a leading communications provider in the United States, currently operating throughout 39 states and the District of Columbia. With 19 million video customers, 31 million residential broadband customers, and 10 million voice customers, Comcast passes a total of 60 million homes and businesses. Comcast is the nation's largest gigabit Internet provider.

We've spent nearly \$30 billion in the last decade building an expansive fiber-dense network comprised of 191,000 route miles that carries an immense amount of traffic and has demonstrated extraordinary performance throughout the pandemic. Comcast has established an industrywide reputation for technology leadership, superior products, and operational efficiency.

As a right-of-way (ROW) user in over 4,000 communities nationwide and in 39 states, Comcast is accustomed to designing fiber networks in a variety of environments. The network of 191,000+ route-miles of fiber features a combination of both aerial and underground plant, and the system is designed to comport with local, state, and federal laws and guidelines.

- b. A description of how the proposed project will or will not duplicate existing broadband infrastructure.

As described in more detail in Section C and Section D above, Comcast's proposed fiber-to-the-home project will provide residents of the Town of Hudson with enhanced services, speed tiers, and scalability, therefore providing the Town with very distinctly different broadband service provider experience and bandwidth potential well beyond current network needs.

- c. A description of an applicant's financial ability to undertake the proposed broadband construction project.

Comcast is a publicly traded company, creating efficient capital deployment and business plans that satisfy the needs of customers while also satisfying a rational business case—often expressed in business *pro formae*. Comcast is a Fortune 50 company with revenues of \$116 billion (FY2021). The company's CEO is Brian Roberts. All public financial disclosures including the SEC filings, Earnings, and Annual Reports can be found at [Financials | Comcast Corporation \(cmcsa.com\)](https://www.comcast.com/financials).

- d. A description of how the proposed project will affect the ability of individuals to access health care service from home, including any impact upon the costs of those services.

As described in detail in Section D above, the proposed project will have an immediate significant impact have on residents by providing improved speed tier offerings at competitive price points. This will assist Town of Hudson residents to access health care service from home at speed tiers that they can tailor to their specific needs, and up to 1.2 Gigabits to handle higher data-impacting health-care services. The fiber network is scalable and will grow with network demands, and telehealth will become more relied upon and sophisticated in the future.

Importantly, we discussed how the Internet Essentials and Internet Essentials Plus programs will provide an affordable high-speed broadband option for the first time to qualifying Town of Hudson residents. Currently residents must pay \$94.95/mo. for access to a broadband connection in order to access health care services at home – which we know must leave some residents without the

access, or struggling to keep it. With an Internet Essentials plan, all Town of Hudson residents will be able to access to health care from home at a price-point they can afford (and with an ACP credit, coupled with Internet Essential or Internet Essentials Plus Tier, a qualifying resident's monthly bill will be \$0).

- e. A description of how the proposed project will affect the ability of students to access educational opportunities from home.

As described in detail in Section D above, Comcast's Internet Essentials and Internet Essentials Plus program are available to all Town of Hudson residents that participate in the National School Lunch Program or, for college students, received a Federal Pell Grant. Again, in addition to the increase of available speed tiers that will support the access of educational opportunities from home, the availability of Comcast's Internet Essentials program will ensure that all Town of Hudson residents and students will be able to access educational opportunities from home.

- f. Letters and messages in support of the application submitted by prospective customers, local government officials, and other interested persons.

See attached letters in support of the proposed project from:

- The Town of Hudson
- The Hudson Chamber of Commerce
- Business Owner in Town of Hudson
- State Representative Zimmerman
- St. Croix County 2021 Residential Broadband Survey Comments

- g. Any other equitable factor that the applicant desires to discuss, including one or more of the factors in Wis. Stat. § 196.03(6) that the applicant believes its project would advance. In discussing this element, the following information may be useful:
 - Technical support and training materials that the applicant intends to provide.
 - Information that the applicant intends to use to promote better broadband adoption and use.
 - A description of a program or outreach to provide assistance to individuals of low income.

As described in detail in Section D, Comcast's Internet Essentials offering is the most comprehensive and successful low-income broadband adoption program in the nation. Its success is due in part to working closely with our partners to refine the Internet Essentials program in meaningful ways, and, working closely with the communities that we serve to get Internet Essentials information to customers where they are at.

Our active Internet Essentials outreach includes school districts, community partners, libraries, and government officials to help ensure all eligible residents are aware of the Internet Essentials program and how it can help their household. Along with these communications, we have shared

social media posts and advertisements in many local publications, including those that represent the multicultural community. Our materials are available to all our partners free of charge in 35 different languages. Our online application can also be translated into seven different languages to help households connect to the internet.

As also explained in Section D and important to discuss again here, the Internet Essentials program addresses more than broadband affordability, but also includes free training to help customer unlock the potential of the internet. Customers can access hundreds of hours of basic internet digital navigation training accessible on its website at [Internet Essentials' Learning Center](#), including a Seniors Guide to Navigating the Web, Coding Training, Educational Programs, and a Veteran's Guide to Navigating the Web.

WISCONSIN

Town of Hudson



980 County Rd A, Hudson, WI 54016

www.townofhudsonwi.com

715-386-4263

Mon-Tue-Wed 9:00-4:00

March 3, 2022

Wisconsin Broadband Office
Broadband Expansions Grant Review Committee
Public Service Commission of Wisconsin
610 North Whitney Way
PO Box 7854
Madison, WI 53707

To Whom it May Concern:

This letter is to inform you that the Town of Hudson, in partnership with Comcast, is committed to the expansion of high-performance broadband offerings to the underserved areas of the Town of Hudson, and hereby supports Comcast's application for a Wisconsin PSC broadband grant allowing for Comcast to make a significant investment to build its fiber-based broadband network throughout the Town.

Comcast currently serves the neighboring communities of Hudson and North Hudson and is proposing to extend its network into the Town of Hudson. Comcast has a proven track record of investment in its network and of continually innovating its service offerings for its customers. Comcast would bring to the Town of Hudson its advanced technology and scalable network that delivers among the fastest broadband speeds in the country, including up to 2 Gbps for residential customers and up to 10 Gbps for business customers.

The residents of the Town of Hudson would greatly benefit from having Comcast available as a high-speed broadband service provider. Comcast would offer the same robust suite of services that it offers in Hudson and throughout the metropolitan area, providing the residents of the Town of Hudson more speed offerings at a competitive price, and a fiber network that provides increased capabilities as well as ensuring that the Town is prepared for the digital future.

Affordability of high-speed broadband service is also a priority for the Town of Hudson. Comcast has demonstrated that it will offer all qualifying residents of the Town of Hudson with its Internet Essentials Service Tier. This will ensure that cost does not shut out any resident of the Town of Hudson to the benefits of high-speed broadband, whether it be in distance learning, remote working, telehealth, a connection to services and so much more.

The Town of Hudson Board supports Comcast's application and looks forward to working with Comcast to deploy a future-proof fiber-based network that will increase the broadband service speed offerings for currently underserved residents and offer affordable, high-speed broadband services for all.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Foster". The signature is fluid and cursive, with the first name "Tim" and last name "Foster" clearly distinguishable.

Tim Foster
Town Chairman
Town of Hudson



COMCAST OFFERING FREE AND DISCOUNTED INTERNET THROUGH AFFORDABLE CONNECTIVITY PROGRAM

Comcast Continues to Invest in the Twin Cities to Help Close the Digital Divide

ST. PAUL– MARCH 15, 2022 – Comcast in the Twin Cities is offering free and discounted Internet options through the [Affordable Connectivity Program](#) (ACP). The ACP provides eligible low-income households a credit up to \$30 a month toward the cost of Internet service (\$75 per month for households on qualifying Tribal lands). Customers who qualify can apply ACP credits to any tier of Xfinity Internet, including [Internet Essentials](#).

“As the world becomes more digital, it is crucial that everyone has the needed resources and opportunities to excel in today’s environment,” said Kalyn Hove, Regional Senior Vice President, Comcast Twin Cities. “The Affordable Connectivity Program is a once in a lifetime opportunity that Comcast is proud to be participating in and offer to any of our customers who qualify so they can benefit from the connectivity needed to function in today’s world.”

Comcast recently introduced two new ways for customers to benefit from the ACP:

Internet Essentials Plus

Internet Essentials Plus is a new tier of service for Comcast’s hallmark digital equity program that is available in all Comcast service areas to any customer who qualifies. It offers twice the download speed – up to 100 Mbps – of the traditional Internet Essentials service, which has a 50 Mbps download speed. Internet Essentials Plus is available for \$29.95/month to new customers who qualify. Existing Internet Essentials customers can upgrade to this new, faster tier at any time. Customers who subscribe to Internet Essentials Plus and enroll in ACP will effectively get broadband for free after the \$30/month government discount is applied.

Xfinity Mobile

Comcast’s top-rated Xfinity Mobile service, which includes 5G, is now available to customers enrolled in ACP, giving them the ability to save money on their connectivity needs inside and out of the home. Internet Essentials customers can use their \$30/month ACP discount to pay for both Xfinity Internet and Xfinity Mobile service. For example, an Internet Essentials customer (paying \$9.95/month) can add one line of Unlimited on Xfinity Mobile (\$45/month) for \$24.95/month after applying the ACP discount.

Xfinity Mobile has no line access or activation fees and comes with unlimited talk and text, so customers only pay for cellular data. Customers can mix and match between two straightforward plans on Xfinity Mobile with 5G included, Unlimited or By the Gig, and pair these mobile plans with any tier of Internet service to provide ultimate flexibility. They can also switch back and forth between Unlimited and By the Gig mobile plans at any time. In addition, Xfinity Mobile devices automatically connect to millions of Xfinity WiFi hotspots across the country to reduce customers’ dependence on cellular and save money.

Sign up for ACP

Eligible households that enroll in the program can receive \$30/month toward their Internet and mobile service (\$75/month on Tribal lands). New and existing Xfinity Internet or Internet Essentials customers can visit www.xfinity.com/acp or call 844-389-4681 for more information, to determine eligibility, and sign up.

Today’s announcement is part of Project UP, Comcast’s \$1 billion commitment to reach tens of millions of people over the next 10 years with the tools, resources, and skills needed to succeed in a digital world. For more information about Comcast’s comprehensive connectivity program for low-income Americans visit:

<https://corporate.comcast.com/values/internet-essentials>.

RESIDENT SURVEY COMMENTS SHOWING NEED FOR IMPROVED HIGH SPEED BROADBAND SERVICE IN ST. CROIX COUNTY

ST. CROIX COUNTY BROADBAND DEVELOPMENT OPTIONS REPORT

COMMENTS

PUBLISHED BY DESIGN NINE IN 2021

FOUND: STCROIX_COUNTY_BROADBAND_STUDY.PDF (SCCWI.GOV)

Concerns about Baldwin

- We need Comcast Xfinity. They give way more data for a reasonable price. Right now AT&T & Baldwin lightstream charge a ton of money for a non competitive product.
- The town of Hudson should not be limited to one provider! Baldwin telecom has a monopoly on services outside the "city" of Hudson. Baldwin absolutely sucks in what they can provide and their service. We need something else!!!!!!
- Not good that Baldwin-Telecom has a monopoly in the town of Hudson. No other options. Not thrilled with their service or pricing but no other options. Reliability has been pretty good lately, but when it does go down, it's down for a long time. And never any credit on our bill for the loss of service.
- Baldwin telecom is a monopoly
- Have new Baldwin Lightstream fiber (installed 2019) and service is worse than the original cable by them. Easily bogged down, poor streaming, outages. Cellular also is unreliable! Using T Mobile. Please help!
- Baldwin has awful customer service. It takes days for them to deal with outages and they refuse to issue credit for time without service due to malfunctions in their equipment. They know we're stuck with them so they have no motivation to maintain customers.
- I use Baldwin LightStream because they are the only provider I can get. Their service is too expensive for not very good service.
- Baldwin Lightstream monopolizes Baldwin and charged more than double for lesser service than many typical cities
- Kick out Baldwin lightstream
- I would like to be able to get cable TV from Comcast instead of Baldwin Lightstream's antiquated technology TV service. I had Dish Network until they dropped RSN from their programming and then switched to Baldwin Lightstream. I've had Baldwin Telecom for an ISP since 2017 and they're adequate for my needs. I use Magic-Jack for a landline.
- I'm tired of not having any other options than Baldwin Lightstream. I may not use other options, but I cant even shop around for something more affordable. My "high speed" internet only shouldn't cost more than 100.00 every month and still have loading problems
- It's terrible living in Baldwin because BTI has a monopoly on cable and internet service. We only use the internet from BTI and it costs twice what it would cost from other carriers for the same speed.
- "Baldwin Lightstream plans are EXTREMELY OVERPRICED, its ridiculous and it's all due to a MONOPOLY on the area. Over \$100 for a service that should cost \$40-50. Issue is this is the ONLY option I have at my address (same for many others around me). Due to the cost I have a 3MBs service which is still \$50 a month. That speed is not a typo. It's absurd.
- Living in a county like St. Croix which is very expensive and populated, I am disappointed in the lack of options for internet. Baldwin lightstream is the best we can get and they are not that great. They charge 100 a month for a service which would be bottom tier for most cities. They also have little to no competition, so they have no reason to improve or be competitive in plans or pricing. I ended up downgrading to DSL from cable because I was tired of paying so much for their cable internet package. St. Croix county needs better internet.
- Baldwin Telecom is very hard to work with
- Baldwin Light stream is my only option and they are horrible and they are ridiculous with their price!!!!
- Baldwin telecom is the worst service ever. It goes down almost daily. We've had them out to our house numerous times and they've down work but it still continues to go down all the time. It is absolutely NOT reliable for someone who works

from home. It's so bad that if you worked for someone, you would likely be fired because you'd never be able to work for long periods of hours due to it slowing way down or losing connection

- In a month Baldwin Lightstream is cutting the service we are currently using, charging outrageous fees to continue using the only service they will be providing, and not allowing us to install it in our until unless our neighbors agree and pay the fees as well. We have no other options for internet, even though Baldwin Lightstream says that's a lie
- Get rid of Baldwin LightStream or at least offer other providers. The service sucks and it buffers constantly. We lose WiFi just sitting still and eventually it'll come back on again but does that multiple times. Also, their customer service people need some serious training...
- Baldwin telecom is the ONLY non satellite option we have and they've created a monopoly
- Baldwin Lightstream charges \$117 per month for high speed fiber stand alone internet service. The price is way too high, but they have a monopoly in our area so there is no other option for high speed internet. Please help!
- I don't know that this is a government issue, I just feel that Baldwin Lightstream should not have a monopoly over the area and I should have the choice of more service providers. Their internet is horrible even with the fiber upgrade and we constantly have connection issues. If I was given the option of another provider I would 100% switch.
- Where I live there is realistically only one option for "reliable" "speedy" internet, which is Baldwin Telecom. It frequently doesn't work (broadband issues). As we speak I am having trouble with staying connected to meetings and being on my cell. Baldwin telecom is expensive and their customer service horrible - and they know it, but because they are essentially a monopoly to this area they don't care! There is no incentive for them to improve because there are no other options for our location. Our children are little now, but as they grow older the demand for internet will grow. Thank you for this survey! I hope there is something we can do for our community!
- Baldwin offers the only fiber solution in my area which prevents competition which ends up costing the residents more money for internet and tv services
- Baldwin is the only option at my house. It works fine but is wildly overpriced and has slowdowns during peak hours. I never receive any form of communication from them. The biggest pro to Baldwin is fortunately they don't have data caps. But it seems like since they're the only option they just charge whatever they want, with a take it or leave it attitude.
- Baldwin Telecom's service is reliable, but they only respond to outages during business hours. The price of their service is too expensive for the bandwidth. They are the only choice where I live that is non-satellite based.
- Break up the Baldwin telecom monopoly on service in our area, we have no options because no competition can enter our area, this monopoly ILEC was formed over a hundred years ago when telephone service was in it's infancy. Make it so that competitors can enter our area and offer competitive service and rates
- Baldwin is just too expensive. My cousin's identical service is about half the price.
- BALDWIN BASICALLY HAS A MONOPOLY HERE AND CAN CHARGE HIGH PRICES. SOME MORE COMPETITION WOULD HELP LOWER PRICES, AS THEY ARE WAY TOO HIGH.
- Baldwin Lightstream is pricing people out because they have a monopoly. There needs to be more competition of services so that people have more choices.
- "Please give us any other option than Baldwin Telecom. They are very expensive and provide very poor customer service when you need them.
- Baldwin Lightstream being the only provider, they charge way too much for internet services.
- Baldwin telecom is horrendous and a monopoly. Their stranglehold on most of the county is a violation of antitrust laws. They are by far the worst service provider I have been forced to use. I wish them nothing but the worst and hope they go bankrupt.
- Baldwin telecom sux!!!! should not have a monopoly. too expensive. service terrible!
- Baldwin Telecom is very overpriced for what they offer. If I do not use their \$100 per month option, the speeds are so slow they are unusable. I wish there were other options available
- I have Baldwin light stream because they have a monopoly. Baldwin light stream are the only ones who have the rights to install fiber optic in certain parts of the county. The internet is slow, sometimes fast. But it has no reliability, it can crash at any moment.
- "Baldwin Lightstream seems have a monopoly on internet service in this area. For what people pay the speed of internet should be faster. What they offer is outdated like living in 2009. They have also discontinued any service that may need to be done inside your home.

- Baldwin Lightstream has a Monopoly. There are no other competitive options. Either you pay \$54 for 3mbps or \$96 for 75mbps - there are no options between. I have the faster plan and it remains very unreliable for what I pay
- If you can get rid of the Baldwin Telecom monopoly that would be wonderful!
- Baldwin is so expensive. I call them to see if I can get cheaper service and they always say I have cheapest service but it is so expensive for me on fixed income
- I don't believe my internet provider, Baldwin Telecom, is very forthright about the plans they offer. They only list certain plans depending on the area of the county you live in yet if you call and ask about plans, many more are available. The price they charge for the download speeds we get do not seem fair. \$100/month for just internet service is ridiculous. I wish there was more competition.
- Baldwin Telecom is a complete joke, but we have NO other option. It would be great if the county could provide something that is more reliable and less expensive. The best speed that Baldwin Telecom can offer is the lowest speed at Comcast and we pay \$100/month to get it. Absolutely ridiculous!
- Baldwin Lightstream should NOT be the only option in Baldwin for internet, phone and cable!!!!
- The fiber optics that we pay for from Baldwin telecom is spotty, and doesn't even cover our entire house. We still have it though in order to get basic channels and it is functioning in bedrooms and the home office. However, there is no access to internet in the main living spaces of our home such as the kitchen, dining room, living room. We were forced to change our cellphone plan to unlimited data in order to meet the demands of work and school.
- I will say Baldwin Lightstream has great customer service but their internet packages are limited on speed and price. My neighbor had AT&T DSL for years out here and the fastest he could get was 3 MB and dumped it for Baldwin Lightstream. I am hopeful completing this survey that Baldwin Lightstream changes their internet packages to be faster and more affordable. Their base internet needs to be increased from the pathetic 2 MB they have. That's like owning a speedy 56k modem from 1998!! Even my brother who lives in northern Wisconsin has Mosaic and he gets 250 MB internet at \$79.95 a month, which is faster and cheaper than any offers around here. Any help you can get this message to Baldwin Lightstream is greatly appreciated to change their packages to faster and affordable internet. I use it daily working from home, I pay my bill on time every month so at least turn up the speed."
- Government can stop the Baldwin telecom control of the area and then get their nose out.
- Baldwin telecom services are extremely expensive
- Baldwin Lightspeed needs a competitor - they have a monopoly
- The monopoly of Baldwin light stream should be ended so they are forced to be competitive.
- Baldwin Lightstream has a monopoly on internet and phone service in my area. The internet service is poor but most importantly the customer service and technical service through Baldwin Lightstream is terrible and unacceptable and extremely overprice. For example 06/14/21 I had a power outage (not weather related), the next day the phone jacks stopped working for the landline. It was a hassle to convince Baldwin Lightstream to come to the residence and evaluate the problem. The technician was able to get 1 phone jack to work but the technician wasn't interested in determining the root cause of the problem because it would take too much time and be too expensive. It cost \$77 plus \$30 trip charge (5 miles) to get 1 phone jack to work but the problem has not been solved and the issue is with their phone lines. No other companies can compete with Baldwin Lightstream because they state they "own" the fiber optic lines. Something needs to be done to eliminate them as a business or allow competition in to the area
- I do not like that Baldwin Lightstream has a monopoly on Internet access in our area. There should multiple/affordable options for people.
- "Baldwin telecom is very expensive but dependable. It would be nice to at least have alternatives
- Please get a different vendor in the area besides Baldwin telecom. Their customer service is crap and there internet services are overpriced for the speeds they provide. We are with Tmobile due to there price gouging and there very very very horrible customer service.
- It seems like Baldwin Lightstream has a monopoly on services where I live (and the surrounding area). The fact that other providers are not an option means that there is no competition, whether that be competition for costs, quality of services, or any other factor. Most of the time, it feels that we are "stuck," specifically for those that rent rather than own the location in which they live

- "We reside in an area where Baldwin light stream is our only option. Therefore it's way overpriced and the service is unreliable. I often get disconnected or poor connectivity while working from home full time. We also experience slowness in streaming channels and have occasional blackouts, and this is with their "best service"
- Baldwin is the only service provider to my apartment building, and they have a monopoly of the area due to the lack of other companies allowed in the area. Their prices are much too expensive for the service we receive. We have been in the area for less than a year and have had at least two service requests due to poor internet
- It is about time Baldwin Lightstream NOT own a monopoly in this region; please provide another choice
- Baldwin's speeds and pricing tiers are absurd
- Would like more options than the hold Baldwin Telecom has on the community. I might not choose something else but would like to have the options
- Baldwin is the only service for this area. NO competition so they can change what they want
- I find it ridiculous that Baldwin Lightspeed has a monopoly on my area's internet service. It's so expensive and the quality is poor. I refuse to obtain their services so I use my wireless hotspot. I wish I had more internet options

Concerns about Fixed Wireless

- I am paying \$250+ a month for fixed wireless internet through AT&T and need it daily to work. There are no other options.
- Please bring fiber to our house!!!!

Requests for Comcast/ Reliable Faster Internet

- 52% of residents are "dissatisfied" or "very dissatisfied" with current Internet speeds
- 90% of respondents are interested in faster and more reliable Internet service
- We pay \$200/month just for internet (does not include cell service) and the service is so poor we are unable to work from or watch a 10 second video.
- We need better internet services like Comcast. We had century link and the internet sucked. Baldwin telecom isn't much better were told would have good service. 5 times since we got Baldwin we couldn't actually do our job because no internet. Very frustrating
- We have been a Xfinity internet customer since moving to Hudson 3 years ago. It is amazing speed and reliability I would never use any other service. Previous we had Baldwin internet which for the same price only offers 5mb speed Xfinity at that price is 75mb. Do not change anything with Xfinity they make the internet great.
- Slow and poor internet connections put rural residents at a disadvantage compared to urban areas. It contributes to a disparity in income and learning.
- Internet in this area is ridiculously expensive
- With Covid and its impact on working from home, students distance learning etc - its critical infrastructure that St Croix County develop a plan to have several high quality internet providers for all residents. Thanks.
- This seems like a no brainer for a large area so close to the cities. It blows my mind that we have such poor internet here.
- I wish we had Comcast as an option
- Considering our proximity to the Twin Cities and population of St.Croix County we really should have much faster internet available at a lower cost. I pay 100 dollars a month for only 75M of speed and that is way too expensive for that speed.
- In Baldwin we have no options other than what we have here, in Hammond 4 miles away they got internet cheaper then we can get it for. I have tried to find a carrier cheaper than Hughes net but none are available here
- I have been extremely disappointed with Baldwin LightStreams reliability. This was a concern prior to Covid and has been an ongoing issue since I lived in Baldwin for the past 4 years. I have had the ability to work from home, but have been unable to do so with the internet cutting out several times per day. I work in Baldwin and experience the same issues at my office as well. The cost for internet is very high compared to the previous provider we used when I lived in river falls, nearly double the cost for the same speed. Unfortunately the only other option available in Baldwin is satellite, which does not meet our needs
- As a resident of Baldwin WI, my ISP is Baldwin Lightstream, who refer to as the "Baldwin Mafia". Due to a long standing and ancient rural telephone law, no other ISP is allowed to offer services in my area, giving Baldwin Lightstream an effective monopoly. The Baldwin Mafia is well aware of this fact and it is reflected in their pricing. I work with people across the

nation and NO ONE pays even close to the kind of cost I do for services. Whatever law that is giving Baldwin Lightstream this special protected status needs to be repealed.

- Twin Cities it seems there should be more choice for us here, being 30 miles away.
- THE PROBLEM IN OUR HOUSEHOLD IS NOT THE INTERNET SERVICES. IT IS THE TELEVISION SERVICE, WHICH IS TERRIBLE. IT WOULD BE GREAT TO HAVE COMPETITION SUCH AS COMCAST. DISH NETWORK AND DIRECT TV ARE OTHER OPTIONS, AND WE HAVE USED BOTH IN THE PAST. NOT VERY EXCITED ABOUT THEIR SERVICE, WE SOULD PREFER A GOOD CABLE TV PROVIDER.
- Very limited Internet service in our area. Prices are high due to no competition
- We would love to have Comcast/Xfinity in our area or another option with more reasonable pricing. They currently do not provide service at our address but have used them in the past and found them to be the most affordable and reliable. Baldwin light stream is very expensive for the service provided and does not have any mid level options for download speeds
- We pay \$125 a month for decent internet. However with the limitations of options we have this drives the cost up. I have friends that pay \$40 a month for way better service. It seems like price gouging is happening with internet.



SHANNON ZIMMERMAN

STATE REPRESENTATIVE • 30th ASSEMBLY DISTRICT

March 16th, 2022

Wisconsin Public Service Commission
Dennis Klaila, Broadband Expansion Grant Program
610 North Whitney Way
Madison, WI 53707-7854

Dear Mr. Klaila,

I am writing today to support a grant application by Comcast to provide high-speed broadband service in the Town of Hudson. More broadband in this area would improve the overall quality of life for area residents.

According to the UW-Madison Applied Population Laboratory, St. Croix County is projected to experience an astounding 41 percent increase in population from 2010-2040, the highest percentage gain in the state. You can drive in any direction and see new buildings, new homes, and new people coming to our corner of Wisconsin.

The Town of Hudson is located in a rapidly expanding and dynamic area. To take advantage of that growth, it would be strategically smart for the state to ensure that residents in the Town of Hudson have broadband access. It is a necessity for businesses, and access is a make or break decision for people when moving to a new area.

I strongly support awarding a Public Service Commission Broadband Expansion Grant for this project. Thank you very much for your consideration. Please do not hesitate to contact me to discuss this personally.

Sincerely,

A handwritten signature of Shannon Zimmerman, consisting of a stylized 'S' and 'Z'.

Shannon Zimmerman
State Representative
30th Assembly District



March 10, 2022

Wisconsin Broadband Office
Broadband Expansions Grant Review Committee
Public Service Commission of Wisconsin
610 North Whitney Way, P.O. Box 7854
Madison, WI 53707

To Whom it May Concern:

The Hudson Area Chamber of Commerce & Tourism Bureau is pleased to submit this letter of support on behalf of Comcast's application for a Wisconsin State Broadband Grant. The Hudson Chamber believes that based on Comcast's proven record of innovation and investment in the City of Hudson and North Hudson, that the Town of Hudson and its businesses and residents will likewise benefit from the expansion of Comcast's network into the Town of Hudson.

The Hudson area continues to experience growth. To help ensure the new businesses in the Town of Hudson are successful, and that it can attract new growth, the Town of Hudson needs scalable, high-speed, dependable, and innovative business-class internet service offerings. Furthermore, the Town of Hudson's proximity to the Twin Cities Metro, as well as to the City of Hudson, requires that the business-class internet services be offered at competitive prices, or the Town risks losing businesses to a neighboring city that has more service offerings. Extending the Comcast network to the Town of Hudson will ensure that the entire Hudson area is well-positioned to support and attract continued business growth into the future.

The pandemic made it clear that connecting every resident to a reliable, affordable internet connection at home is vitally important for participation in the digital economy of the future - whether it is for telehealth, distance learning, or working from home. Through Comcast's Internet Essentials program, qualified Town of Hudson residents can receive reliable broadband at an affordable price, an option that may not be currently available to them.

As the Hudson region continues to grow, it is important to our economic viability that we have a long-term vision for keeping our residents and businesses connected and engaged. For these reasons, the Hudson Chamber of Commerce supports the Comcast broadband grant application for the Town of Hudson.

Best Regards,



Mary Claire Olson Potter
President



CLUB LOCATION:

707 Rodeo Circle
Hudson, WI 54016
(715) 441-9386

March 16, 2022

Wisconsin Broadband Office
Broadband Expansions Grant Review Committee
Public Service Commission of Wisconsin
610 North Whitney Way, P.O. Box 7854
Madison, WI 53707

To Whom it May Concern:

I along with other local businesses in the Town of Hudson are eager to support Comcast on their application for a Wisconsin State Broadband Grant. The broadband services currently offered in the Town of Hudson have not been adequate in providing for the needs of a growing community with businesses trying to keep pace with demand. We are in need of a provider that offers a variety of speeds, prices, products and reliability. Comcast has a proven record of affordable, reliable internet services in the nearby communities of the City of Hudson, North Hudson, River Falls, and Prescott with speeds up to 1.2 Gig.

Our area of Hudson, North Hudson, and the Town of Hudson, continues to experience growth. Abundant availability of broadband at a variety of speeds up to 1 Gig and prices will help ensure the businesses in the Town of Hudson can successfully grow with the community and compete with our neighbors in attracting new residents. The Town of Hudson is minutes from the regional hub of the Twin Cities and therefore the community needs a provider with the speeds and products offered by Comcast to compete locally and worldwide. Their broadband service is competitively priced with reliability that allows businesses to adapt for their customers quickly and easily.

Additionally, Comcast has a track record of investing in Wisconsin communities with infrastructure that is scalable, and customer focused, empowers residents with programs like Internet Essentials where qualifying residents receive reliable broadband at an affordable price. The pandemic made it clear that staying connected to a quality broadband internet is vitally important for participation in the digital economy of the future - whether it is for telehealth, distance learning, or working from home.

Comcast service will support our businesses, help further community development, and keep our residents connected with quality broadband internet services not currently available here. Local businesses and residents are currently at a disadvantage from our neighbors without this type of infrastructure. For these reasons we request that the Wisconsin Public Service Commission approve Comcast's grant application for a Broadband Expansion grant to build a fiber to the premise, last-mile network in the Town of Hudson.

Sincerely,

Chris Spafford

Owner, Midwest Health and Fitness